

EXHIBIT 35

FRIDAY, JULY 14, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

GOKKOW LITIGATION SERVICES

877.370.3377 ph | 917.591.5672 fax
deps@qolkow.com

1 time?

2 MS. SHAPIRO: Objection.

3 QUESTIONS BY MR. WOHLGEMUTH:

4 Q. You can answer, sir.

5 A. So there were particularly
6 New York Post and Daily Mirror -- Daily
7 Mirror? I'm not -- Daily Mail, sorry,
8 stories in that time frame, in early 2011,
9 that reported on connections to people like
10 from -- between Epstein and people like
11 Prince Andrews -- Prince Andrew, sorry, in
12 the UK. And in those stories were references
13 to there being new investigations of Epstein.

14 That's what I -- that's
15 essentially what I recall, just there were
16 celebrity connections being made, famous
17 people connections being made, and reporting
18 on new investigations.

19 Q. Did you understand that
20 Mr. Staley also had a relationship with
21 Mr. Epstein in this time period, 2011?

22 A. I knew they had a business
23 relationship. I didn't -- I don't have a
24 recollection of understanding anything more
25 than that or any of the details of their

1 relationship.

2 Q. I think I know the answer to
3 this question, but were you aware of the
4 number of accounts that Mr. Epstein had at
5 JPMorgan?

6 A. Not at all.

7 Q. Okay. Were you able to
8 access -- strike that.

9 Did you access any account
10 activity associated with any Epstein account
11 while you were working on these
12 Epstein-related issues?

13 A. No.

14 Q. Did Steve Cutler -- well,
15 strike that.

16 I take it Steve Cutler never
17 asked you to review any Epstein account
18 activity?

19 A. I do not believe Steve asked me
20 to do that. He wasn't his client of the
21 investment bank to begin with.

22 Q. Are you aware of Steve Cutler
23 ever directing anyone to review Epstein's
24 account activity?

25 A. I don't have any knowledge

1 A. I guess I'd leave that to
2 others to judge.

3 Q. And what do you recall
4 Mr. Lefkowitz telling you?

5 Well, strike that.

7 A. I don't have a clear
8 recollection of the conversation, but, again,
9 as part of the prep for today, you know, I
10 saw an e-mail in which I'm reporting on that
11 conversation.

12 When I saw that e-mail, that
13 jogged my memory of, you know, what is
14 reported in the e-mail. That's sort of the
15 extent of my recollection.

16 I don't have the e-mail in
17 front of me, but it was to the effect of me
18 asking Jay about whether there was an active
19 investigation. That was the question, you
20 know, that Cutler and others wanted to see if
21 we could get an answer to.

22 And he reported, you know, that
23 to his knowledge there was not an active
24 investigation of his client.

25 But as you would expect someone

1 sophisticated like him to say, you know, we
2 don't necessarily know. We wouldn't
3 necessarily know. A kind of, I don't think
4 so. We probably know, but we don't think so,
5 anything is possible. Something to that
6 effect.

7 Q. I just want to make sure I
8 understand the testimony you just gave.

9 Is it fair to say that
10 Mr. Lefkowitz couldn't definitively rule out
11 the absence of an investigation?

12 MR. GAIL: Objection.

13 THE WITNESS: I think that --
14 you stated that maybe...

15 QUESTIONS BY MR. WOHLGEMUTH:

16 Q. Oh, yeah. Yeah. I meant to
17 say existence.

18 Is it fair to say that
19 Mr. Lefkowitz couldn't definitively rule out
20 the existence of an investigation?

21 A. That is what I recall him
22 saying. Not in those words, but he said it
23 was possible, but he didn't think so, that
24 there -- didn't think that there was an
25 investigation, but he couldn't know for sure.